

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

SHEILA PORTER, Plaintiff)	
)	
)	
v.)	
)	Civil Action No. 04-11935-DPW
ANDREA CABRAL, SUFFOLK)	
COUNTY SHERIFF'S DEPARTMENT,)	
SUFFOLK COUNTY, and)	
CORRECTIONAL MEDICAL)	
SERVICES, INC.)	
Defendants)	
)	

**DEFENDANTS ANDREA CABRAL, SUFFOLK COUNTY SHERIFF'S
DEPARTMENT AND SUFFOLK COUNTY'S MOTION TO COMPEL THE
PRODUCTION OF TESTIMONY FROM THE PLAINTIFF**

Now come the above named Defendants and respectfully request that this Court issue an order compelling the Plaintiff to provide testimony concerning the specific information that she provided to the FBI. As reasons therefore the Defendants state that such information and testimony is highly relevant and necessary to the Defendants' ability to defend the allegations set forth in the Plaintiff's amended complaint. The Plaintiff refused to provide such information during her deposition claiming the informant's privilege. It is the Defendants' contention that the informant's privilege does not apply in this instance and that they are entitled to discover this highly relevant evidence. The Defendants also rely on the attached Memorandum of Law.

Defendants Respectfully Request A Hearing On Their Motion.

Respectfully submitted,
For the Defendants Andrea Cabral,
Suffolk County Sheriff's Department,
And Suffolk County
By their Attorney

/s/ Ellen M. Caulo
Ellen M. Caulo
B.B.O. #545250
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Date: October 28, 2005

CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 7.1(A)(2)

Counsel for the Defendants hereby certifies pursuant to Local Rule 7.1 that she has conferred with counsel for the Plaintiff in an effort to resolve or narrow the issues raised in this motion.

/s/ Ellen M. Caulo
Ellen M. Caulo

Date: October 28, 2005